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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 AVELARDO RIVERA and YASMINE
12 ROMERO, individually and on behalf of all
13 others similarly situated,

14 Plaintiffs,

15 v.

16 AMAZON WEB SERVICES, INC.,

17 Defendant.
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Case No. 2:22-cv-00269-JHC

STIPULATED MOTION AND ORDER TO
MODIFY DEADLINES

Pursuant to Local Civil Rule 7(d)(1), Local Civil Rule 10(g), and the Court’s February 10, 2024 order modifying deadlines, *see* Dkt. 234, Plaintiffs Avelardo Rivera and Yasmine Romero (“Plaintiffs”) and Defendant Amazon Web Services, Inc. (“AWS”) (collectively, the “Parties”), stipulated and jointly move the Court to stay the current expert discovery and class certification deadlines while the parties work towards a potential resolution of this matter.

In support of this Stipulated Motion, Plaintiffs state as follows:

1. On February 7, 2024, Plaintiffs filed an unopposed motion to modify the schedule in this case, which the Court granted. *See* Dkt. 234 (the “Order”).
2. Since then, the Parties have been engaged in meaningful discussions regarding a potential resolution of the case.
3. To facilitate the Parties’ ongoing discussions and conserve the resources of both Parties in expensive expert discovery, the Parties respectfully request that the Court stay the current expert and class certification deadlines below, and set a deadline of March 31, 2025 (four weeks from today) for the Parties to file a Joint Status Report regarding the progress of their discussions about a potential resolution.

Event	Current Deadline	Proposed Deadline
Plaintiffs’ rebuttal expert disclosures regarding class certification issues	March 4, 2025	Stayed.
Completion of expert discovery regarding class certification issues	April 21, 2025	Stayed.
Parties’ deadline to file <i>Daubert</i> motions regarding class certification experts	June 5, 2025	Stayed.

Plaintiffs' deadline to file motion for class certification	June 5, 2025	Stayed.
AWS's deadline to respond to motion for class certification	July 17, 2025	Stayed.
Plaintiffs' deadline to reply in support of class certification	August 14, 2025	Stayed.
Parties' deadline to file joint status report to propose post-class certification deadlines	Fourteen (14) days after Court's ruling on motion for class certification	Stayed.
Parties' deadline to file joint status report	None	March 31, 2025

WHEREFORE, the Parties respectfully request that the Court enter an order staying the current case deadlines in accordance with this Stipulated Motion, and setting a March 28, 2025 deadline for the Parties to file a joint status report.

Respectfully submitted,

Dated: March 3, 2025

AVELARDO RIVERA and YASMINE ROMERO, individually and on behalf of all others similarly situated,

By: /s/ Wright A. Noel
One of Plaintiffs' Attorneys

Wright A. Noel
wright@carsonnoel.com
CARSON NOEL PLLC

20 Sixth Avenue NE
Issaquah, WA 98027
Tel: 425.837.4717
Fax: 425.837.5396

J. Eli Wade-Scott*
ewadescott@edelson.com
Schuyler Ufkes*
sufkes@edelson.com
EDELSON PC
350 North LaSalle Street, 14th Floor
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

Philip L. Fraietta*
pfraietta@bursor.com
Alec M. Leslie*
aleslie@bursor.com
Max S. Roberts*
mroberts@bursor.com
BURSOR & FISHER, P.A.
1330 Avenue of the Americas, 32nd Floor
New York, New York 10019
Tel: 646.837.7150
Fax: 212.989.9163

Randall K. Pulliam*
rpulliam@cbplaw.com
Samuel R. Jackson*
sjackson@cbplaw.com
CARNEY BATES AND PULLIAM, PLLC
519 West 7th Street
Little Rock, Arkansas 72201
Tel: 501.312.8500
Fax: 501.312.8505

**Admitted pro hac vice*

Attorneys for Plaintiffs and the Putative Class

AMAZON WEB SERVICES, INC,

Dated: March 3, 2025

By: /s/ Ryan Spear (with authorization)
One of Defendant's Attorneys

Ryan Spear, WSBA No. 39974
RSpear@perkinscoie.com
Nicola Menaldo, WSBA No. 44459
NMenaldo@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone 206.359.8000
Facsimile 206.359.9000

Attorneys for Defendant Amazon Web Services Inc.

ORDER

IT IS SO ORDERED.

DATED this 3rd day of March, 2025.



JOHN H. CHUN
UNITED STATES DISTRICT JUDGE